

28 November 2005

The Honourable Mr. Li Wah-Ming
Chairman, Legco Panel on Food Safety and Environmental Hygiene

Dear Mr. Li,

Reorganisation Plan for the Food Safety Regulatory Framework

We, the Government Veterinary Officers of the Agriculture, Fisheries and Conservation Department, the Food and Environmental Hygiene Department and the Leisure and Cultural Services Department, whilst supportive of the proposal to create a new food safety department, are extremely concerned at the flawed nature of the proposed organisation structure as outlined in the Legco paper No. CB (2) 464/05-06 (01).

Our principle concerns are that firstly, the proposal does not encompass all aspects of food production from the farm level to processing, wholesale and retail supply and food importation. Secondly, the proposal does not appear to give adequate consideration of the many professions which are critical to ensuring food safety. Thirdly, there has been inadequate consultation in the development of this proposal.

The production of safe food relies on a multi-disciplinary approach which includes sound production practices, adequate monitoring and testing, appropriate regulatory controls involving industry collaboration and education. The current structure omits primary production expertise involved in horticulture, aquaculture and livestock husbandry. It also fails to include important aspects of marketing.

Overseas experience has demonstrated the importance of professional veterinary input in all aspects of food safety, contributing significantly to the stable supply of safe and wholesome animal products, whilst safeguarding the health of food animal populations. In so-doing aspects of public health have also been addressed. The use of avian influenza vaccination in local and imported chickens is a prime example of successful veterinary contribution to the health of

the Hong Kong population. The proposed organisational structure does not sufficiently facilitate veterinary input at policy level.

The first opportunity provided to view the details of the proposal, to concerned staff involved in the re-organisation, was when the paper under consideration was published on the Legco website. Given the high priority afforded to food safety by the public, it is crucial that all sectors of the community especially front-line staff involved in the daily management of food production are given ample opportunity to comment on the proposal.

The creation of a new department requires detailed analysis and consideration of all relevant issues and we strongly urge that this proposal be returned to the administration for further consideration. We remain committed to safeguarding public health and food safety and wish to be involved in the further development of an authority to achieve these aims.

Yours faithfully,

Signed for and on behalf of all Government Veterinary Officers

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cc.

Dr. York Chow, Secretary for Health, Welfare and Food